

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	CRIMINAL NO. 20CR30147-01-SMY
)	
ZACHARY T. WATSON,)	
)	
Defendant.)	

STIPULATION OF FACTS

Comes now, Steven Weinhoef, United States Attorney for the Southern District of Illinois, and Jennifer Hudson, Assistant United States Attorney, together with the Defendant, Zachary T. Watson, and his attorney, Todd Schultz, and hereby enter into the following Stipulation of Facts consistent with Section 1B1.3 of the United States Sentencing Guidelines pertaining to the Defendant's relevant conduct.

1. Wednesday August 19, 2020, Zachary T. WATSON, Alize MAYES, and C. C. traveled to a residence in Highland, Madison County, Illinois within the Southern District of Illinois.

2. After WATSON, MAYES, and C. C. entered the residence, WATSON withdrew a firearm and pointed the firearm at M. R.

3. The robbers took M. R.'s vehicle keys and M. R.'s bank card. M. R. was restrained with a chord and forced to enter M.R.'s own vehicle. MAYES drove M. R., WATSON, and C. C.

to two bank Automatic Teller Machines. MAYES used M. R.'s personal bank card and withdrew \$800 from Regions' Bank.

4. MAYES, WATSON, and C. C. demanded that M.R. provide his debit card pass code so that the withdrawal could occur.

5. During this time, Region's Bank was insured by the FDIC.

6. M.R. was physically restrained in the back of his own truck while MAYES, WATSON, and C.C. possessed multiple firearms. M. R. did not consent to MAYES, WATSON, and C. C. taking United States currency, but thought he was going to die. Regions Bank did not consent to the taking.

7. M. R. did not give MAYES, WATSON, and C.C. permission to take his 2017 Black Dodge Ram. M. R. was bound, had numerous pistols brandished at him to gain his ready compliance, and M. R. thought he was going to die. M. R. was struck in the head with a hard, metal object. M. R. was taken to Saint Louis University Hospital due to his injuries.

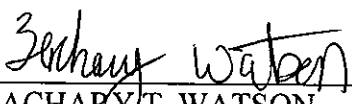
8. The 2017 black Dodge Ram was manufactured outside of the state of Illinois, thus traveling in interstate commerce prior to August 19, 2020.

9. After withdrawing funds from the Regions and attempting to withdraw funds at Scott Credit Union, MAYES drove back to M. R.'s residence. MAYES, WATSON, and C. C. left the 2017 black Dodge Ram.


10. WATSON led M. R., still bound, back into his garage at the residence, where WATSON tried to force M. R. into the suspects' vehicle. M. R. fled and contacted police.

11. Upon WATSON's arrest, law enforcement recovered an empty magazine belonging to a Sig Sauer 9mm pistol from WATSON'S person. Law enforcement also recovered Law enforcement found M. R.'s Regions card and a Cabela's credit card. At I-55 mile marker three, Illinois State Police recovered one Hi-Point, model 09, 9mm pistol loaded and with a round in the chamber. Two additional firearms were recovered from a compartment inside the suspects' vehicle's dashboard.

SO STIPULATED


ZACHARY T. WATSON
Defendant


JENNIFER HUDSON
Assistant United States Attorney


TODD SCHULTZ
Counsel for the Defendant